

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

The Mahoningside Power Plant

650 Summit Street N. W. Warren, Ohio

Prepared For:

South Main Sand & Gravel 183 Central Parkway S. E. Warren, Ohio

on behalf of:



Daniel J. Sferra, Mayor

H. Herbert Laukhart
Director of Public Service
and Safety

Prepared By:



4531 BELMONT AVENUE YOUNGSTOWN, OHIO 44505

September 1995

on noting the material evidence of asbestos, drums and underground storage tank locations, transformers, hazardous material usage, past disposal sites, stained areas and areas showing vegetative stress).

INNERSCOPE has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527 of the Subject site known as Mahoningside Power Plant, 650 Summit Street N.W., Warren, OH, Trumbull County. Any exceptions to, or deletions from, this practice are described in the Scope of Work as detailed above. This assessment has not revealed the evidence of recognized environmental conditions in connection with the property except for the following:

Twelve areas of potential concern were identified during the course of this study. Six are associated with database information gathered from Federal, State, and Local sources. The remaining six were derived from Innerscope's observations of Site conditions as well as other relative historical and personal resources. The potential concerns identified by this study are as follows: i) the presence of three (3) RCRIS-TSD listed facilities within a one-mile radius of the subject Site, ii) one (1) listed State Hazardous Waste Site (SHWS) within a one-mile radius of the project Site, iii) the presence of three (3) CORRACTS listed sites located within a one-mile radius of the subject Site, iv) one (1) BUSTR listed leaking underground storage tank (LUST) was identified within one-half mile radius of the subject Site, v) the presence of one (1) BUSTR listed facility with active underground storage tanks (UST) within a one-quarter mile radius of the subject Site, vi) the documented presence of two (2) listed RCRIS hazardous waste generators within a one-quarter mile radius of the subject property, vii) the visually observed and confirmed presence of asbestos containing materials and asbestos contamination on the subject property, viii) the past presence of PCB containing transformers in use on the property and the potential for PCB impact of the subject property, ix) the suspected, unconfirmed presence of UST's on the subject property, x) the observed presence of indiscriminate dumping and storage of materials within and around the project Site structures, xi) the

The database listed site is known as Standard Transformer, 212 Dana Street, Warren, Ohio (OH ID 278-0770). Generally situated greater than a one-half mile radius Northeast from the subject property, Standard Transformer's database listing provided by EDR, Inc. indicated a Medium priority listing. Records did not indicate the Site as being listed on the National Priority List (NPL). The last preliminary assessment date for this site is listed as being conducted in August of 1990.

Given the approximate distance and gradient location relative to the subject Site, not to mention naturally occurring and manmade barriers between this facility and the subject property, it is unlikely that this facility has or would have a negative environmental impact on the project Site.

iii) According to the Environmental Protection Agency (EPA), hazardous waste handlers with RCRA corrective actions are listed in the Corrective Action Report as CORRACTS. A database search was conducted through EDR to identify any CORRACTS sites within an ASTM suggested radius of the subject Site. Three (3) CORRACTS sites were identified within a one mile radius of the subject property at an equal or higher elevation than the subject Site. The sites were referenced as General Electric Company Ohio Lamp Plant, GMC Packard Electric Division - Warren City Plant, and General Electric Company - Trumbull Operations.

These CORRACTS sites are located generally greater than one-half mile away from the Site to the East/Northeast and Southeast, respectively. According to the updated Government Version of the Corrective Action Report (4-10-95), all sites were assigned a priority listing of LOW and have had suggested RCRA Facility Investigations completed.

Given the approximate distance and location relative to the subject Site, not to mention naturally occurring and manmade barriers between these facilities and the subject property, it is unlikely that known CORRACTS sites would have a negative

environmental impact on the project Site.

During INNERSCOPE's site visit, no visual evidence was observed that would indicate that the subject property has been negatively impacted by known CORRACTS listed sites.

iv) State database listings indicated the presence of one (1) facility with known leaking underground storage tanks (LUST's) within a one-half mile radius of the subject property.

However, upon further review of the database source, it was determined that this LUST was associated with a regulated UST closure which was overseen by BUSTR.

As part of this study, a telephone interview was conducted with a fire inspector from the Warren City Fire Department Fire Prevention Bureau. During this interview, Inspector John Bettiker was requested to divulge any information the department may retain or personal knowledge he may have regarding UST's and their potential for impact on the subject property Site.

Inspector Bettiker reported that records do not indicate the presence of known UST's on the subject property nor is their any indication or documentation that a UST release has negatively impacted the Site. Inspector Bettiker reported that the LUST site identified by Innerscope's database inquiry had been associated with the removal of a UST and that he has no personal recollection or departmental records that would indicate that this site has impacted the subject property. No further information was offered through this agency.

Given the approximate distance and location relative to the subject Site, not to mention naturally occurring and manmade barriers between this listed facility and the subject property, it is unlikely that this known LUST site would have a negative environmental impact on the project Site.

v) Database sources reported one (1) facility with active underground storage tanks (UST's) within a one-quarter mile radius of the subject property. This UST facility is situated generally Northeast of the subject Site with tanks less than or equal to nine (9) years in age.

A telephone interview with the Warren City Fire Department Fire Prevention Bureau was conducted by Innerscope in reference to these UST facilities. Inspector Bettiker reported that there are no records indicating UST's on the subject property and the listed UST site is, to the best of his knowledge, in good condition. Details of phone conversations are provided in Appendix C.

Given the approximate distance and location relative to the subject Site, not to mention naturally occurring and manmade barriers between this listed facility and the subject property, it is unlikely that this known UST site would have a negative environmental impact on the project Site.

vi) Two generators of hazardous wastes were reported by database inquiry within a one-quarter mile radius of the subject property. Both of these facilities maintain a RCRA small quantity generator status (RCRA SQG). Sites on this list generate at least 100 kg but less than 1000 kg of non-acutely hazardous waste per month and meet other applicable requirements.

Database listings for these hazardous waste generating sites do not indicate any present or pending violations or corrective actions. The fact that these facilities are listed as RCRA generators is not necessarily a reason for concern. Facilities that remain in compliance with their RCRA permits should not have unmanageable environmental impact on surrounding properties. Investigation into the regulated operation and record keeping for these facilities may be reviewed within the "Generator File" as maintained by the Ohio EPA. Please refer to the EDR report in Appendix F for additional information.

During Innerscope's Site investigation, no known or material evidence of negative environmental impact related to listed RCRA hazardous waste generators was observed on the subject property.

vii) During Innerscope's on-site investigations, suspect asbestos containing materials (ACM) were visually observed within safely accessible project areas. The presumed materials were associated with thermal systems insulation, roofing systems, transite panels, surfacing and miscellaneous materials found throughout areas of demolition, salvage or indiscriminate dumping.

As part of this study, Innerscope has reviewed two prior asbestos bulk surveys of the property conducted in 1990 & 1992, respectfully. The first study was conducted by Safety Dynamics, Inc. (Poland, Ohio) on behalf of the current property Owner, Leonid Stychno. The second, completed by Mansdorf & Associates, Inc. of Stow, Ohio was conducted at the request of Attorney J. Casto (Akron, Ohio). In both surveys, the majority of the bulk material samples obtained throughout various locations on the subject property returned a positive analysis for asbestos content. Much of the asbestos containing materials were found to be in poor condition with a high instance of gross material damage and residual contamination.

It is important to note that Innerscope 's Site survey was limited to safely accessible structural and topographic areas. Furthermore, access into two on-site structures, the former Cooling Tower Building & the Tractor Maintenance Building, was not granted by the property Owner, thus, Innerscope cannot make comment on the suspected presence or condition of asbestos containing materials that may exist in these structures. However, the Mansdorf & Associates survey report (1992) makes reference of bulk samples obtained from the interior or exterior of these structures that were confirmed to contain ashestos.

In any regard, prior asbestos bulk surveys, as well as Innerscope's site inspection, indicate that there is a high probability that asbestos has contaminated the ground surface as well as the interior of most on-site structures due to natural degradation or improper work practices during alleged demolition and salvage activities.

Due to the natural degradation of Site conditions and alleged improper demolition and salvage activities that have been conducted on the property since the issue date of prior asbestos survey reports, it is Innerscope's recommendation that an updated asbestos bulk survey be conducted for the subject property wherein all structures, as well as physical or material Site features, be addressed. This report should make note of the location, condition, quantity and potential for future damage of confirmed asbestos containing materials. Based upon this survey report, abatement specifications and cost estimates can be estimated for Site remediation.

viii) The historic industrial operation of the subject property has primarily involved the production of electricity for community wide consumption. Not uncommon to electrical power generating and distribution is the usage of electric transformers. Transformers manufactured prior to 1976 are known to have the potential for containing PCB (Polychlorinated Biphenyls) laden oils. PCB's are toxic molecules, which when ingested, attach themselves to human fat tissue and act as potential carcinogens. The danger of PCB's develops when the oils or other fluids containing PCB's leak out and contaminate soil and groundwater.

Innerscope's review of historic Site maps and layout drawings indicate that several large pad and ground mounted transformers were used on the property. The greatest accumulation of transformers was detailed as the transformer yard along the Eastern side of the Power Generation Building between the exterior wall and Mahoning River Retaining Wall. A secondary transformer location was so noted near the South entry of the Power Generation Building. Historic Sanborn Fire Insurance Maps of the subject

property indicate that transformer areas were designated on the property as early as 1915.

A phone interview was conducted with Mr. Jim Fish of Ohio Edison. Mr. Fish is the Manager of Ohio Edison's Warren Operations and maintains limited information on the Mahoningside Plant and Summit Street substation. Mr. Fish reported that prior to Ohio Edison's sale of the property, all transformers were removed and properly disposed. Mr. Fish added that Ohio Edison maintains an active substation on the former Mahoningside Site and that PCB samples obtained by O. E. have been below action levels. During the same conversation, Mr. Fish stated the that he thought that the owners of the property, after Ohio Edison, stored transformers on the property and that transformer oils, presumed to contain PCB's, were released.

A second interview source, Mr. Dave Robison of the City of Warren Engineering
Department, confirmed that his inquiries into Ohio Edison's transformers indicated that
O.H. had removed all known transformers before the sale of the property. Furthermore,
Mr. Robison revealed that he was made aware that the current property owner had
allegedly received transformers for storage, reclamation, or possibly on-site disposal. Mr.
Robison thought that an excavation or pit was created by the Owner on the South side of
the main structures so that transformers and transformer oils could be buried. It was
presumed that the pit has since been filled in.

In 1990, Safety Dynamics, Inc. conducted a limited asbestos bulk survey and PCB investigation on the subject property. The area of PCB investigation was limited to the trenched area adjoining concrete pads East of the Power Generation Building. This area was known as the former transformer yard. At least two out of five total shallow soil samples indicated the presence of PCB's. One of the two samples indicated PCB concentrations in excess of acceptable levels. It is important to note that Safety Dynamic's survey was specifically limited by the property Owner to the area known as the transformer yard. Access to other structures and land areas was denied.

A second area of potential PCB contamination was observed during Innerscope's on-site investigation. Several fluorescent light ballasts, which may contain PCB's, were observed to be discarded with miscellaneous materials on the ground near the entry into the former Tractor Maintenance Building. Most ballasts were not labeled as to PCB content and must be presumed to be PCB contaminated. It appeared that a few of the ballast casings had been breached releasing fluid to the environment.

As of the date of issue for this ESA report, the current property Owner, Leonid Stychno, had not responded to this firm's request for details of operations conducted on-site since taking possession of the property. Therefore, Innerscope cannot confirm nor dismiss, the alleged storage, disposal or reclamation of transformers as indicated by personal interview sources.

Based upon historic transformer usage on the subject property, as well the alleged on-site reclamation and suspected disposal of transformers and transformer oils, Innerscope recommends that extensive subsurface sampling be performed throughout all representative property areas to detect and quantify PCB contamination. Special consideration should be given to those areas where transformers were known to reside as well as the alleged areas of transformer disposal or reclamation.

During Innerscope's Site investigation, the locations of potential underground and aboveground storage tanks (UST's/AST's), as well as buildings used for the storage of gasoline and oil, were identified on historic Site maps and layout drawings of the subject property.

Sanborn Fire Insurance Maps, originally compiled in 1908, note the storage of oils and gasoline in small, stand alone structures on the property. Although later maps issued by Sanborn show the location of storage structures to have changed, the practice of storing unknown quantities of gas and oil continued during operation of the Mahoningside facility. The first use of underground storage tanks (UST's) appear in historical Site

maps issued by Sanborn in 1922. One tank is depicted along W. Summit Street in front of a former garage & auto repair building. This tank is again noted in 1950 Sanborn maps but not on following maps issued in 1967.

At Innerscope's request, Site plans were provided by Ohio Edison for purposes of this study. These plans show both structural and topographic features when the plant was last in operation, approximately 1970. These-drawings indicate that possibly one or two UST's were in use on the property as part of daily operations. Furthermore, structures labeled as associated with oil or oil pumping were detailed along the Northern train trestle and along the Mahoning River retaining wall.

Contact was made with the local fire inspector, Captain John Bettiker of the Warren City Fire Department, to discuss the known or documented presence of UST's on the subject property. Captain Bettiker noted that his department's records do not indicate present or past UST's on the subject property. He found no record of the UST's detailed by Sanborn Map references.

Representatives from Ohio Edison were contacted regarding known underground storage tanks or environmental conditions on the subject property. Mr. Howard Couch, Environmental Services Manager for Ohio Edison reported that he had no knowledge of UST's on the property but he did mentioned the possible presence of above ground storage tanks which had contained No. 2 Fuel Oil. The oil was reportedly used to start the flame on the boilers. A follow-up conversation with Mr. Couch was conducted where he added that a UST may exist on the property near the old scale house. He presumed that the building was probably heated and the source of the fuel oil may have been stored underground.

Mr. Rick O'Callahan, Supervisor Ohio Edison's Summit Street sub-station, reported that in the Winter of 1994, Ohio Edison was called out to assist the Warren Fire Department

in response to fire on the property. While responding to the fire, Mr. O'Callahan recalls that two firemen fell into an open pit or bunker which held a petroleum containing sludge. This bunker was reported to be located near the railroad trestle which runs along the North boundary of the property. The source of the fire was an abandoned diesel fuel line which was presumed to lead to an underground fuel oil tank.

Based upon the known historic usage of oil and petroleum products, as well as the unconfirmed status of UST's on the subject property, it is Innerscope's recommendation that an extensive subsurface investigation be conducted on the property to identify the presence of suspected petroleum related contaminants. Furthermore, it is recommended that attempts be made to confirm the presence of UST's on the subject property.

x) During Innerscope's on-site investigation, indiscriminate dumping and storage of materials was observed throughout the facility. Miscellaneous materials were observed to be representative of metals, wood, plastics and masonry items as well as miscellaneous materials. In several areas, discarded materials have been buried or dumped into pits and sub-basement levels.

Several drums were also identified within the areas of indiscriminate dumping and subbasement levels. Ownership and/or contents could not be verified in most cases due to lack of material labels or inability to safely access the drum locations.

It is important to note that access into two on-site structures, the former Cooling Tower Building & the Tractor Maintenance Building, was not granted by the property Owner, thus, Innerscope cannot make comment on the content or condition of materials stored within these structures.

It is recommended that indiscriminate dumping and exterior storage practices be controlled or cease and that exterior discarded materials be disposed of in a proper and appropriate manner. Should the indiscriminate dumping be the result of unauthorized site access, attention should be given to better secure or restrict the ability of unauthorized entry onto the property. If a material of unknown or potentially hazardous content is to be disposed, it is recommended that a full analytical waste characterization be performed so that an appropriate method of disposal is determined.

basement levels of the Boiler and Power House were partially underwater. It was determined that access to these levels proposed an unreasonable level of risk and potential for human harm. Accordingly, visual inspection of these levels were limited to available points of observation.

It is most likely that the source of water in the basement is the Mahoning River which bounds the property to the East. Although beyond the scope of work for this project, it is speculated that the retaining wall or historic inlets for river water into the plant are being breached. Water levels did not appear to be stagnant.

Innerscope recommends that the standing water in the sub-levels be sampled for asbestos, PCB's, volatile organic compounds, pH, and metals. Based upon the results of analytical testing, a course of action may be developed to address the standing water in the basement as well as safe access for further physical inspection.

been used for industrial purposes since approximately the late 1890's. Facilities and support operations involved in the production of electrical power have operated and flourished at the Site since the early 1900's until approximately 1970. Additionally, electric lamps and bulbs were manufactured and stored at the Site for approximately fifteen years. It is not uncommon for industrial or manufacturing facilities to produce waste by-products that have potentially hazardous or toxic constituents.

It is reasonable to ascertain that the long term industrial operations conducted at the Site may have negatively impacted upon the subject property. It is recommended that an extensive subsurface investigation be conducted such that soils are screened for metals, volatile organic and semi-volatile organic compounds.

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Phase I Environmental Site Assessment Mahoningside Power Plant 650 Summit Street N.W. Warren, Ohio

INNERSCOPE Project Number: 95221

Prepared For:

South Main Sand & Gravel 183 Central Parkway S.E. Warren, OH 44483

Attn: Mr. Dante Massacci, Jr.

September 7, 1995

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Mahoningside Power Plant 650 Summit Street N.W. Warren, Ohio

INNERSCOPE Project Number: 95221

1.0 INTRODUCTION

INNERSCOPE TECHNICAL SERVICES, INC. (INNERSCOPE) was retained by Dante Massacci, Jr. / South Main Sand & Gravel on behalf of the City of Warren, OH, to perform a Phase I Environmental Site Assessment of the above referenced property. Presently, this Site, in part, is being used as personal storage for items brought on site by the owner. No known apparent business of a commercial or industrial nature exists on the property at present. The large structures that were historically known to be associated with electrical power production were observed to be in structural disrepair and subject to past salvage and demolition operations. The site location is shown in Appendix E.

The objective of this study was to determine the potential for hazardous/toxic substances and/or wastes (as defined in the Resource Conservation and Recovery Act [RCRA] of 1976, the Comprehensive Environmental Response Compensation and Liability Act [CERCLA] as amended by the Superfund Amendment Reauthorization Act [SARA] of 1980, and the Toxic Substance Control Act [TSCA] of 1976), to be associated with this property. Accordingly, the scope of the investigation consisted of a record search and a site inspection, including a cursory limited asbestos survey, as applicable. Photographic documentation of the site visit is provided in Appendix H. The assessment field report is included in Appendix A.

2.0 PHYSICAL SITE DESCRIPTION

A Site inspection was conducted on July 19, 21, & 30 and August 3 & 9, 1995 by Matthew J. Mesaros, CEI and Leo Hicks. Mr. Mesaros maintains professional credentials as a Certified Environmental Inspector (# 11450) and as an Ohio certified asbestos hazard evaluation specialist (# 31978). Mr. Hicks serves as Environmental Specialist and Field Inspector. Existing and/or potential contamination sources, topographic and drainage features, superficial soil characteristics and the general site layout were noted. Particular emphasis was placed on noting suspected asbestos-containing material (ACM), drum and tank locations, transformers, hazardous material usage, past disposal sites, stained areas and areas showing vegetative stress.

2.1 General Site Conditions/Topographical Setting

The Site is located on a loosely rectangular-shaped parcel of land in a visually industrial and residential area of the City of Warren, Trumbull County, Ohio. The Site, approximately 6.58 acres, is improved land that is maintained by the current property owner. No known apparent business of a commercial or industrial nature exists on the property at present. The large structures that were historically known to be associated with electrical power production were observed to be in structural disrepair and subject to past salvage and demolition operations. The general location of the parcel is shown in Appendix E. Photographic representation of the Site is included in Appendix H.

On March 10, 1995, the City of Warren, Ohio - Engineering, Planning & Building Department filed an Adjudication Order whereby the demolition of the Mahoningside Power Plant was ordered. The order was issued because of violations and/or deficiencies referenced under Ohio Administrative Code 4101:2-1-02 & 4101:2-1-39. The Order was appealed by the property owner on March 29, 1995. Current status of this order is unknown. See Appendix I for a copy of the Adjudication Order.

USGS Survey maps show topography at the property Site is nearly level with a gentle slope to the East/Southeast that ultimately meets the Mahoning River. The ground surface appears to be primarily of indigenous soil associations native to Urban Land as detailed in the Soil Survey of Trumbull County (issued 1992) provided by the U.S. Department of Agriculture. Much of the property has some overgrowth of weeds and grasses while areas of vehicle access are roughly cleared and maintained.

The Site is loosely bounded by the Mahoning River, Summit Street N.W., Tod Avenue, and the Conrail railway. Vehicle access to the Site is currently gained from Summit Street, however, historic site access has been made from Tod Avenue. During historic operations, the property was well serviced by the Conrail Railway which forms the Northern boundary of the Site.

2.2 Storage Tanks

The U.S. Environmental Protection Agency (USEPA) estimates that 8-20 percent of all underground storage tanks (USTs) leak and/or have had releases to the environment.

Newly enacted federal and state regulations have been implemented to strictly control the use of USTs. Above-ground storage tanks (ASTs) may also be sources of product releases.

A State database inquiry made through Environmental Data Resources was conducted regarding the documented presence or recorded release from UST's on or proximal to the subject property. Database sources did not indicate the presence of UST's within the boundaries of the subject property.

A telephone interview with Inspector John Bettiker of the Warren City Fire Department Fire Prevention Bureau was conducted by Innerscope in reference to known or registered UST's on the subject property. Inspector Bettiker reported that there are no departmental

records indicating UST's on the subject property or that a UST release has negatively impacted the project Site.

Representatives from Ohio Edison were contacted regarding known underground storage tanks or environmental conditions on the subject property. Mr. Howard Couch, Environmental Services Manager for Ohio Edison, reported that he had no knowledge of UST's on the property, but he did mention the possible presence of above ground storage tanks which had contained No. 2 Fuel Oil. The oil was reportedly used to start the flame on the boilers. A follow-up conversation with Mr. Couch was conducted where he added that a UST may exist on the property near the old scale house. He presumed that the building was probably heated and the source of the fuel oil may have been stored underground.

Mr. Rick O'Callahan, Supervisor Ohio Edison's Summit Street sub-station, reported that in the Winter of 1994, Ohio Edison was called out to assist the Warren Fire Department in response to fire on the property. While responding to the fire, Mr. O'Callahan recalls that two firemen fell into an open pit or bunker which held a petroleum containing sludge. This bunker was reported to be located near the railroad trestle which runs along the North boundary of the property. The source of the fire was an abandoned diesel fuel line which was presumed to lead to an underground fuel oil tank.

During Innerscope's on-site activities, known visible or material evidence of the presence of UST's was not identified and may have been inhibited by current Site conditions.

Further study into the confirmed presence of UST's is warranted.

2.3 PCBs

Polychlorinated biphenyls (PCBs) were commonly used in transformers, light fixture ballasts, capacitors and hydraulic systems because of their desirable thermal

characteristics. PCBs have been demonstrated to be highly toxic. Because of their toxicity and persistence in the environment, their manufacture was discontinued in the U.S. in 1976.

Under current USEPA regulations, transformers must be classified as "non-PCB" (containing oils which are less than 50 parts per million (ppm) PCBs), "PCB-contaminated" (containing 50-499 ppm PCBs), or "PCB transformers" (500 ppm or greater PCBs). All new transformers must be guaranteed as "non-PCB" by their manufacturer. Any transformer which has not been tested for its PCB content is classified as "PCB-contaminated", in accordance with USEPA regulations (40 CFR Part 761).

During INNERSCOPE's Site inspection, a large electric sub-station was observed within a fenced in area of the property bordering Summit Street. Transformers did not indicate labels that would indicate PCB content. Ohio Edison owns the sub-station and is responsible for its maintenance and up-keep. In cases where unmarked transformers are identified, they are assumed to be PCB contaminated until proven otherwise. No visible or material evidence of apparent releases from this transformer were identified during Innerscope's Site visit. It can only be assumed that this transformer may contain PCB contaminated oils. In any regard, the transformers would be the sole responsibility of Ohio Edison.

Innerscope's review of historic Site maps and layout drawings indicate that several large pad and ground mounted transformers were used on the property. The greatest accumulation of transformers was detailed as the transformer yard along the Eastern side of the Power Generation Building between the exterior wall and Mahoning River Retaining Wall. A secondary transformer location was so noted near the South entry of the Power Generation Building. Historic Sanborn Fire Insurance Maps of the subject property indicate that transformer areas were designated on the property as early as 1915.

A phone interview was conducted with Mr. Jim Fish of Ohio Edison. Mr. Fish is the Manager of Ohio Edison's Warren Operations and maintains limited information on the Mahoningside Plant and Summit Street substation. Mr. Fish reported that prior to Ohio Edison's sale of the property, all transformers were removed and properly disposed. Mr. Fish added that Ohio Edison maintains an active substation on the former Mahoningside Site and that PCB samples obtained by O. E. have been below action levels. During the same conversation, Mr. Fish stated the that he thought that the owners of the property after Ohio Edison stored transformers on the property and that transformer oils, presumed to contain PCB's, were released.

A second interview source, Mr. Dave Robison of the City of Warren Engineering
Department, confirmed that his inquiries into Ohio Edison's transformers indicated that
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allegedly received transformers for storage, reclamation, or possibly on-site disposal. Mr.
Robison thought that an excavation or pit was created by the Owner on the South side of
the main structures so that transformers and transformer oils could be buried. It is
presumed that the pit has since been filled in.

In 1990, Safety Dynamics, Inc. conducted a limited asbestos bulk survey and PCB investigation on the subject property. The area of PCB investigation was limited to the trenched area adjoining concrete pads East of the Power Generation Building. This area was known as the former transformer yard. At least two out of five total shallow soil samples indicated the presence of PCB's. One of the two samples indicated PCB concentrations in excess of acceptable levels. It is important to note that Safety Dynamic's survey was specifically limited by the property Owner to the area known as the transformer yard. Access to other structures and land areas was denied.

A second area of potential PCB contamination was observed during Innerscope's on-site

investigation. Several fluorescent light ballasts, which may contain PCB's, were observed to be discarded with miscellaneous materials on the ground near the entry into the former Tractor Maintenance Building. Most ballasts were not labeled as to PCB content and must be presumed to be PCB contaminated. It appeared that a few of the ballast casings had been breached releasing fluid to the environment.

As of the date of issue for this ESA report, the current property Owner, Leonid Stychno, had not responded to this firm's request for details of operations conducted on-site since taking possession of the property. Therefore, Innerscope cannot confirm nor dismiss, the alleged storage, disposal or reclamation of transformers as indicated by personal interview sources.

2.4 Asbestos Survey

The purpose of this limited investigation was to visually identify suspect asbestos-containing materials (ACM) found in buildings on-site. During Innerscope's on-site activities, a reconnaissance asbestos survey was performed to identify known suspect asbestos-containing materials.

During Innerscope's on-site investigations, suspect asbestos containing materials (ACM) were visually observed within safely accessible project areas. The presumed materials were associated with thermal systems insulation, roofing systems, transite panels, surfacing and miscellaneous materials found throughout areas of demolition, salvage or indiscriminate dumping.

As part of this study, Innerscope has reviewed two prior asbestos bulk surveys of the property conducted in 1990 & 1992, respectfully. The first study was conducted by Safety Dynamics, Inc. (Poland, Ohio) on behalf of the current property Owner, Leonid Stychno. The second, completed by Mansdorf & Associates, Inc. of Stow, Ohio was conducted at the

request of Attorney J. Casto (Akron, Ohio). In both surveys, the majority of the bulk material samples obtained throughout various locations on the subject property returned a positive analysis for asbestos content. Much of the asbestos containing materials were found to be in poor condition with a high instance of gross material damage and residual contamination.

It is important to note that Innerscope 's Site survey was limited to safely accessible structural and topographic areas. Furthermore, access into two on-site structures, the former Cooling Tower Building & the Tractor Maintenance Building, was not granted by the property Owner, thus, Innerscope cannot make comment on the suspected presence or condition of asbestos containing materials that may exist in these structures. However, the Mansdorf & Associates survey report (1992) makes reference of bulk samples obtained from the interior or exterior of these structures that were confirmed to contain asbestos.

In any regard, prior asbestos bulk surveys, as well as Innerscope's site inspection, indicate that there is a high probability that asbestos has contaminated the ground surface as well as the interior of most on-site structures due to natural degradation or improper work practices during alleged demolition and salvage activities.

2.5 Utilities

Permeable fill materials associated with subgrade utilities can provide pathways for contaminant migration (were it to exist) to or from a site. Electric service at the site is provided by Ohio Edison. Water and sewage treatment is provided by the City of Warren. Natural gas service is provided by East Ohio Gas. Telephone service is provided by United Telephone. Electric service, and probably phone service, appears to be supplied from above-grade poles from the perimeter of the property to the facility. All remaining utilities are located subgrade. It is important to note that although available to the Site, utilities did not appear to be in service.

2.6 Solid and Hazardous Waste

Solid Waste is defined as "any solid, liquid, semi-solid or contained gaseous material which has been discarded, has served its intended purpose, or is a by-product of manufacturing or mining" (CFR 40 Part 260, App. 1). Hazardous waste is any solid waste or combination of solid wastes which may pose present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed (condensed from CFR 40 Part 260, App. 1). In 1976, the Resource Conservation and Recovery Act (RCRA) was enacted as a regulatory statute designed to impose management requirements on generators and transporters of hazardous waste, and on owners and operators of treatment, storage and disposal facilities.

During Innerscope's on-site investigation, indiscriminate dumping and storage of materials, some presumed to be discarded, was observed throughout the facility. Miscellaneous materials were observed to be representative of metals, wood, plastics and masonry items as well as miscellaneous materials. In several areas, discarded materials have been buried or dumped into pits and sub-basement levels. Further study is necessary to determine if any of the materials are hazardous or regulated substances.

It is important to note that access into two on-site structures, the former Cooling Tower Building & the Tractor Maintenance Building, was not granted by the property Owner, thus, Innerscope cannot make comment on the content or condition of materials stored within these structures.

3.0 ADJACENT LAND USE

The immediate area surrounding the project Site is generally light commercial with residential holdings. The Mahoning River bounds the property to the East. Historically, operations conducted at the project Site have drawn water from the river to aid in the

generation of power. Industrial operations have been conducted up-stream from the project Site however, it is beyond the scope of work for this project to ascertain if these location have negatively impacted the river itself.

Commercial and residential structures were apparent South of the Site across Summit Street. A few residential structures were observed along Summit Street toward the Tod Avenue intersection. It is important to note that Ohio Edison maintains a sub-station on a portion of the property along Summit Street. This sub-station was observed to contain electrical transformers however, no labels identifying PCB content was observed. Ohio Edison sources interviewed as part of this ESA indicated that Ohio Edison actively maintains the sub-station and has done some testing for PCB's. It was reported that analytical results for the sub-station were below action levels of 50 ppm. In any regard, the maintenance and content of this sub-station is the sole responsibility of Ohio Edison.

The Conrail railway forms the Northern boundary of the subject property. The track is raised forming an earthen barrier from properties further to the North.

Municipal roadways are in close proximity and have been in place since the early 1900's.

4.0 SITE HISTORY AND RECORDS REVIEW

Information from the following sources was obtained during the records search:

- Title Records, Office of the Recorder
- City Directories, Trumbull County Library
- Trumbull County Tax Map Office
- Warren City Engineers
- The Ohio Edison Company
- US Department of Agriculture, Farm Service Agency, Trumbull County

- USDA, Soil Conservation Office, Trumbuli County
- Current Property Owner, Leonid Stychno
- Sanborn Fire Insurance Maps
- City of Warren Fire Department
- EDR Environmental Reports
- Ohio Environmental Protection Agency (OEPA)
- United States Environmental Protection Agency (USEPA) records

Title records, city directory listings, Sanborn Fire Insurance Maps and aerial photographs were obtained to assess the nature of prior land use. USEPA and Ohio EPA records were obtained to identify sites/facilities subject to Resource Conservation and Recovery Act (RCRA) regulatory action, as well as sites/facilities listed under the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS), as well as other applicable databases located within an ASTM radius of the site.

4.1 Prior Land Use

Limited Chain-of-title and Indenture records were obtained through the Office of the Recorder of Deeds, Warren, Ohio. This information, as well as related historic and legal sources, was used to establish the chronology of site ownership. It is important to note that Innerscope is not a professional title insurance company and does not guarantee that the list of past owners represents a complete delineation of past ownership for legal purposes.

INNERSCOPE's research shows that the subject property has been developed since at least the early 1900's when the Warren Electric Light & Power Company occupied part of the Site in close proximity to the Mahoning River. In 1904, the Warren Electric Light and Power Co. was consolidated into the Warren Water & Light Co. Within a few years of this consolidation, stockholders of the Peerless Electric Company organized operations at the Site into the Hydro-Electric & Gas Co. In 1911, operations at the project Site were again

organized into the Trumbull Public Service Co. In 1922, the Trumbull Public Service Co. became part of the Ohio Public Service Co. (OPS). Effective May 1, 1950, OPS merged with the Ohio Edison Co. In 1961, Ohio Edison ceased operation at Mahoningside due to the installation of large electrical generating units on the Ohio River. Although the plant ceased operations in the early 1960's, Mahoningside was kept available in case of excessive peak power requirements during summer months. Over the years, the plant had undergone numerous additions and remodeling programs that were necessary to facilitate the electrical power output demand of a growing community.

As well as the production of electricity, electric lamps and bulbs were manufactured on the project Site for a period of approximately fifteen years. The Sterling Electrical Manufacturing Company was present at the Site in 1900. Sterling Electrical eventually became the Mahoning Miniature Lamp Division of the General Electric Company. Sanborn Fire Insurance Maps issued in 1922, with updates in the 1950's and 1960's, do not detail the presence of any known business activities unrelated to the operations conducted at the Site by the OPS and Ohio Edison. No known manufacturing was conducted on-site after the 1920's and the demise of the lamp manufacturing facilities was not detailed from records obtained for purposes of this study.

In 1977, Ohio Edison leased the plant to Harold Glunt, John Petrilla, and Summit-Warren Industries. The lease agreement was extended on November 29, 1978. During the tenancy of Summit-Warren Industries, et al., some demolition and salvage activities were conducted at the Site. As a result of the tenant's inability to procure financing, Ohio Edison subsequently sold the property to William Marsteller & Dr. Nestor Stychno et al., in July of 1980. In 1987, William Marsteller and his wife sold their interest in the Mahoningside property to Leonid Stychno, father of Dr. Nestor Stychno. Nestor and Leonid Stychno remain the current property Owners.

Currently, City Directories indicate the Site as being vacant. Directory listings, historic

resources, as well as ownership information, is included within the Appendices of this report.

Aerial photographs for this Site were obtained from the Trumbull County Tax Map Office, the Farm Services Agency and the Soil Conservation Office of Trumbull County, as well as Eastgate Development and Transportation Agency (EDATA). These photographs show the Site and it's surrounding properties in different levels of development representing years ranging from 1938 to 1992. Detail in these photos are limited and their contribution should be considered accordingly. A copy of each aerial photograph obtained by INNERSCOPE is shown in Appendix G.

4.2 Regulatory Review

On September 16, 1985, the United States Environmental Protection Agency (USEPA) adopted an amendment to the National Contingency Plan by which a site can be included in the National Priorities List (NPL) if it meets these three requirements:

- The Agency for Toxic Substances and Disease Registry of the U.S. Centers
 for Disease Control has issued a health advisory that recommends removing
 people from the site.
- USEPA determines the site poses a significant threat to public health.
- USEPA anticipates it will be more cost-effective to use its remedial authority than to use its emergency removal authority to respond to the site.

No NPL sites were identified within a one-mile of the subject site, based on the NPL as published May 1995.

The USEPA and OEPA was requested through EDR information service to identify

CERCLIS-listed sites within an ASTM radius of the subject property. CERCLIS is a data management system used by the USEPA to organize sites that have been identified or have submitted a notification to the regional USEPA administrator that a release, or a likely release, of hazardous materials has occurred, pursuant to Federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) regulations.

No CERCLIS listed sites were identified within a one half-mile radius of the subject site, based on the CERCLIS List as published March 1995. See Appendix F for details.

The Ohio Environmental Protection Agency (OEPA) was requested through EDR Information Services to provide reports listing hazardous waste generators, and hazardous waste treatment, storage and disposal facilities in an ASTM radius of the subject property. Facilities that generate or handle reportable quantities of hazardous waste are required to submit these reports in accordance with provisions Governing Administrative Code and Federal RCRA Regulations. These reports are available from 1982 to the present.

Five RCRIS listed facilities appeared within an ASTM radius of the subject Site. This includes those sites that were listed as quantity generators as well as treatment, storage and disposal sites. See Appendix F for details on database listed sources.

5.0 CONCLUSIONS AND RECOMMENDATIONS

Twelve areas of potential concern were identified during the course of this study. Six are associated with database information gathered from Federal, State, and Local sources. The remaining six were derived from Innerscope's observations of Site conditions as well as other relative historical and personal resources. The potential concerns identified by this study are as follows: i) the presence of three (3) RCRIS-TSD listed facilities within a one-mile radius of the subject Site, ii) one (1) listed State Hazardous Waste Site (SHWS) within a one-mile radius of the project Site, iii) the presence of three (3) CORRACTS listed sites located within

a one-mile radius of the subject Site, iv) one (1) BUSTR listed leaking underground storage tank (LUST) was identified within one-half mile radius of the subject Site, v) the presence of one (1) BUSTR listed facility with active underground storage tanks (UST) within a one-quarter mile radius of the subject Site, vi) the documented presence of two (2) listed RCRIS hazardous waste generators within a one-quarter mile radius of the subject property, vii) the visually observed and confirmed presence of asbestos containing materials and asbestos contamination on the subject property, viii) the past presence of PCB containing transformers in use on the property and the potential for PCB impact of the subject property, ix) the suspected, unconfirmed presence of UST's on the subject property, x) the observed presence of indiscriminate dumping and storage of materials within and around the project Site structures, xi) the observed presence of standing water in the basement and sub-basement levels of the former power producing structures, and xii) the historic industrial usage of the property may pose a negative environmental impact on the subject Site.

During the course of this study, a Federal and State database inquiry was conducted through EDR, Inc. to locate the presence of RCRIS listed hazardous waste treatment, storage or disposal sites (RCRIS-TSD). Database listings indicate the presence of three (3) such facilities within a one-mile radius of the subject property. These sites, referenced as the GMC Packard Electric Division - Warren City Plant, General Electric Co, Trumbull Operations, Warren City Plant and Trumbull Industries, are situated Northeast, Southwest and Southeast, respectively.

Facilities that remain in compliance with their RCRA permits should not have unmanageable environmental impact on surrounding properties. Furthermore, given the approximate distance and gradient location relative to the subject Site, not to mention naturally occurring and manmade barriers between these facilities and the subject property, it is unlikely that these RCRIS-TSD listed facilities would have a negative environmental impact on the project Site.

During Innerscope's Site investigation, there was no material or visible evidence that known listed RCRIS-TSD sites have negatively impacted upon the subject property.

During the course of this study, Innerscope's database inquiry reported the documented presence of one (1) State Hazardous Waste Site (SHWS) listed facility within a one mile radius of the project Site. The SHWS are sites tracked by the Ohio Environmental Protection Agency (OEPA) because hazardous waste has been found at the site or where known, suspected, or likely release of such wastes has occurred. SHWS listed sites may or may not be included on the USEPA's CERCLA database. Sites on this list are also known as Master Sites (MSITES) by the Ohio EPA.

The database listed site is known as Standard Transformer, 212 Dana Street, Warren, Ohio (OH ID 278-0770). Generally situated greater than a one-half mile radius Northeast from the subject property, Standard Transformer's database listing provided by EDR, Inc. indicated a Medium priority listing. Records did not indicate the Site as being listed on the National Priority List (NPL). The last preliminary assessment date for this site is listed as being conducted in August of 1990.

Given the approximate distance and gradient location relative to the subject Site, not to mention naturally occurring and manmade barriers between this facility and the subject property, it is unlikely that this facility has or would have a negative environmental impact on the project Site.

According to the Environmental Protection Agency (EPA), hazardous waste handlers with RCRA corrective actions are listed in the Corrective Action Report as CORRACTS. A database search was conducted through EDR to identify any CORRACTS sites within an ASTM suggested radius of the subject Site. Three (3) CORRACTS sites were identified within a one mile radius of the subject property at an equal or higher elevation than the subject Site. The sites were referenced as General Electric Company Ohio Lamp Plant,

GMC Packard Electric Division - Warren City Plant, and General Electric Company - Trumbull Operations.

These CORRACTS sites are located generally greater than one-half mile away from the Site to the East/Northeast and Southeast, respectively. According to the updated Government Version of the Corrective Action Report (4-10-95), all sites were assigned a priority listing of LOW and have had suggested RCRA Facility Investigations completed.

Given the approximate distance and location relative to the subject Site, not to mention naturally occurring and manmade barriers between these facilities and the subject property, it is unlikely that known CORRACTS sites would have a negative environmental impact on the project Site.

During INNERSCOPE's site visit, no visual evidence was observed that would indicate that the subject property has been negatively impacted by known CORRACTS listed sites.

iv) State database listings indicated the presence of one (1) facility with known leaking underground storage tanks (LUST's) within a one-half mile radius of the subject property. However, upon further review of the database source, it was determined that this LUST was associated with a regulated UST closure which was overseen by BUSTR.

As part of this study, a telephone interview was conducted with a fire inspector from the Warren City Fire Department Fire Prevention Bureau. During this interview, Inspector John Bettiker was requested to divulge any information the department may retain or personal knowledge he may have regarding UST's and their potential for impact on the subject property Site.

Inspector Bettiker reported that records do not indicate the presence of known UST's on the subject property nor is their any indication or documentation that a UST release has

negatively impacted the Site. Inspector Bettiker reported that the LUST site identified by Innerscope's database inquiry had been associated with the removal of a UST and that he has no personal recollection or departmental records that would indicate that this site has impacted the subject property. No further information was offered through this agency.

Given the approximate distance and location relative to the subject Site, not to mention naturally occurring and manmade barriers between this listed facility and the subject property, it is unlikely that this known LUST site would have a negative environmental impact on the project Site.

v) Database sources reported one (1) facility with active underground storage tanks (UST's) within a one-quarter mile radius of the subject property. This UST facility is situated generally Northeast of the subject Site with tanks less than or equal to nine (9) years in age.

A telephone interview with the Warren City Fire Department Fire Prevention Bureau was conducted by Innerscope in reference to these UST facilities. Inspector Bettiker reported that there are no records indicating UST's on the subject property and the listed UST site is, to the best of his knowledge, in good condition. Details of phone conversations are provided in Appendix C.

Given the approximate distance and location relative to the subject Site, not to mention naturally occurring and manmade barriers between this listed facility and the subject property, it is unlikely that this known UST site would have a negative environmental impact on the project Site.

vi) Two generators of hazardous wastes were reported by database inquiry within a one-quarter mile radius of the subject property. Both of these facilities maintain a RCRA small quantity generator status (RCRA SQG). Sites on this list generate at least 100 kg but less than 1000

kg of non-acutely hazardous waste per month and meet other applicable requirements.

Database listings for these hazardous waste generating sites do not indicate any present or pending violations or corrective actions. The fact that these facilities are listed as RCRA generators is not necessarily a reason for concern. Facilities that remain in compliance with their RCRA permits should not have unmanageable environmental impact on surrounding properties. Investigation into the regulated operation and record keeping for these facilities may be reviewed within the "Generator File" as maintained by the Ohio EPA. Please refer to the EDR report in Appendix F for additional information.

During Innerscope's Site investigation, no known or material evidence of negative environmental impact related to listed RCRA hazardous waste generators was observed on the subject property.

vii) During Innerscope's on-site investigations, suspect asbestos containing materials (ACM) were visually observed within safely accessible project areas. The presumed materials were associated with thermal systems insulation, roofing systems, transite panels, surfacing and miscellaneous materials found throughout areas of demolition, salvage or indiscriminate dumping.

As part of this study, Innerscope has reviewed two prior asbestos bulk surveys of the property conducted in 1990 & 1992, respectfully. The first study was conducted by Safety Dynamics, Inc. (Poland, Ohio) on behalf of the current property Owner, Leonid Stychno. The second, completed by Mansdorf & Associates, Inc. of Stow, Ohio was conducted at the request of Attorney J. Casto (Akron, Ohio). In both surveys, the majority of the bulk material samples obtained throughout various locations on the subject property returned a positive analysis for asbestos content. Much of the asbestos containing materials were found to be in poor condition with a high instance of gross material damage and residual contamination.

It is important to note that Innerscope 's Site survey was limited to safely accessible structural and topographic areas. Furthermore, access into two on-site structures, the former Cooling Tower Building & the Tractor Maintenance Building, was not granted by the property Owner, thus, Innerscope cannot make comment on the suspected presence or condition of asbestos containing materials that may exist in these structures. However, the Mansdorf & Associates survey report (1992) makes reference of bulk samples obtained from the interior or exterior of these structures that were confirmed to contain asbestos.

In any regard, prior asbestos bulk surveys, as well as Innerscope's site inspection, indicate that there is a high probability that asbestos has contaminated the ground surface as well as the interior of most on-site structures due to natural degradation or improper work practices during alleged demolition and salvage activities.

Due to the natural degradation of Site conditions and alleged improper demolition and salvage activities that have been conducted on the property since the issue date of prior asbestos survey reports, it is Innerscope's recommendation that an updated asbestos bulk survey be conducted for the subject property wherein all structures, as well as physical or material Site features, be addressed. This report should make note of the location, condition, quantity and potential for future damage of confirmed asbestos containing materials. Based upon this survey report, abatement specifications and cost estimates can be estimated for Site remediation.

viii) The historic industrial operation of the subject property has primarily involved the production of electricity for community wide consumption. Not uncommon to electrical power generating and distribution is the usage of electric transformers. Transformers manufactured prior to 1976 are known to have the potential for containing PCB (Polychlorinated Biphenyls) laden oils. PCB's are toxic molecules, which when ingested, attach themselves to human fat tissue and act as potential carcinogens. The danger of PCB's

develops when the oils or other fluids containing PCB's leak out and contaminate soil and groundwater.

Innerscope's review of historic Site maps and layout drawings indicate that several large pad and ground mounted transformers were used on the property. The greatest accumulation of transformers was detailed as the transformer yard along the Eastern side of the Power Generation Building between the exterior wall and Mahoning River Retaining Wall. A secondary transformer location was so noted near the South entry of the Power Generation Building. Historic Sanborn Fire Insurance Maps of the subject property indicate that transformer areas were designated on the property as early as 1915.

A phone interview was conducted with Mr. Jim Fish of Ohio Edison. Mr. Fish is the Manager of Ohio Edison's Warren Operations and maintains limited information on the Mahoningside Plant and Summit Street substation. Mr. Fish reported that prior to Ohio Edison's sale of the property, all transformers were removed and properly disposed. Mr. Fish added that Ohio Edison maintains an active substation on the former Mahoningside Site and that PCB samples obtained by O. E. have been below action levels. During the same conversation, Mr. Fish stated the that he thought that the owners of the property, after Ohio Edison, stored transformers on the property and that transformer oils, presumed to contain PCB's, were released.

A second interview source, Mr. Dave Robison of the City of Warren Engineering Department, confirmed that his inquiries into Ohio Edison's transformers indicated that O.H. had removed all known transformers before the sale of the property. Furthermore, Mr. Robison revealed that he was made aware that the current property owner had allegedly received transformers for storage, reclamation, or possibly on-site disposal. Mr. Robison thought that an excavation or pit was created by the Owner on the South side of the main structures so that transformers and transformer oils could be buried. It was presumed that the pit has since been filled in.

In 1990, Safety Dynamics, Inc. conducted a limited asbestos bulk survey and PCB investigation on the subject property. The area of PCB investigation was limited to the trenched area adjoining concrete pads East of the Power Generation Building. This area was known as the former transformer yard. At least two out of five total shallow soil samples indicated the presence of PCB's. One of the two samples indicated PCB concentrations in excess of acceptable levels. It is important to note that Safety Dynamic's survey was specifically limited by the property Owner to the area known as the transformer yard. Access to other structures and land areas was denied.

A second area of potential PCB contamination was observed during Innerscope's on-site investigation. Several fluorescent light ballasts, which may contain PCB's, were observed to be discarded with miscellaneous materials on the ground near the entry into the former Tractor Maintenance Building. Most ballasts were not labeled as to PCB content and must be presumed to be PCB contaminated. It appeared that a few of the ballast casings had been breached releasing fluid to the environment.

As of the date of issue for this ESA report, the current property Owner, Leonid Stychno, had not responded to this firm's request for details of operations conducted on-site since taking possession of the property. Therefore, Innerscope cannot confirm nor dismiss, the alleged storage, disposal or reclamation of transformers as indicated by personal interview sources.

Based upon historic transformer usage on the subject property, as well the alleged on-site reclamation and suspected disposal of transformers and transformer oils, Innerscope recommends that extensive subsurface sampling be performed throughout all representative property areas to detect and quantify PCB contamination. Special consideration should be given to those areas where transformers were known to reside as well as the alleged areas of transformer disposal or reclamation.

ix) During Innerscope's Site investigation, the locations of potential underground and above-

ground storage tanks (UST's/AST's), as well as buildings used for the storage of gasoline and oil, were identified on historic Site maps and layout drawings of the subject property. Sanborn Fire Insurance Maps, originally compiled in 1908, note the storage of oils and gasoline in small, stand alone structures on the property. Although later maps issued by Sanborn show the location of storage structures to have changed, the practice of storing unknown quantities of gas and oil continued during operation of the Mahoningside facility. The first use of underground storage tanks (UST's) appear in historical Site maps issued by Sanborn in 1922. One tank is depicted along W. Summit Street in front of a former garage & auto repair building. This tank is again noted in 1950 Sanborn maps but not on following maps issued in 1967.

At Innerscope's request, Site plans were provided by Ohio Edison for purposes of this study. These plans show both structural and topographic features when the plant was last in operation, approximately 1970. These drawings indicate that possibly one or two UST's were in use on the property as part of daily operations. Furthermore, structures labeled as associated with oil or oil pumping were detailed along the Northern train trestle and along the Mahoning River retaining wall.

Contact was made with the local fire inspector, Captain John Bettiker of the Warren City Fire Department, to discuss the known or documented presence of UST's on the subject property. Captain Bettiker noted that his department's records do not indicate present or past UST's on the subject property. He found no record of the UST's detailed by Sanborn Map references.

Representatives from Ohio Edison were contacted regarding known underground storage tanks or environmental conditions on the subject property. Mr. Howard Couch, Environmental Services Manager for Ohio Edison reported that he had no knowledge of USTs on the property but he did mentioned the possible presence of above ground storage tanks which had contained No. 2 Fuel Oil. The oil was reportedly used to start the flame on the boilers. A follow-up conversation with Mr. Couch was conducted where he added that

a UST may exist on the property near the old scale house. He presumed that the building was probably heated and the source of the fuel oil may have been stored underground.

Mr. Rick O'Callahan, Supervisor Ohio Edison's Summit Street sub-station, reported that in the Winter of 1994, Ohio Edison was called out to assist the Warren Fire Department in response to fire on the property. While responding to the fire, Mr. O'Callahan recalls that two firemen fell into an open pit or bunker which held a petroleum containing sludge. This bunker was reported to be located near the railroad trestle which runs along the North boundary of the property. The source of the fire was an abandoned diesel fuel line which was presumed to lead to an underground fuel oil tank.

Based upon the known historic usage of oil and petroleum products, as well as the unconfirmed status of UST's on the subject property, it is Innerscope's recommendation that an extensive subsurface investigation be conducted on the property to identify the presence of suspected petroleum related contaminants. Furthermore, it is recommended that attempts be made to confirm the presence of UST's on the subject property.

x) During Innerscope's on-site investigation, indiscriminate dumping and storage of materials was observed throughout the facility. Miscellaneous materials were observed to be representative of metals, wood, plastics and masonry items as well as miscellaneous materials. In several areas, discarded materials have been buried or dumped into pits and sub-basement levels.

Several drums were also identified within the areas of indiscriminate dumping and subbasement levels. Ownership and/or contents could not be verified in most cases due to lack of material labels or inability to safely access the drum locations.

It is important to note that access into two on-site structures, the former Cooling Tower Building & the Tractor Maintenance Building, was not granted by the property Owner, thus, Innerscope cannot make comment on the content or condition of materials stored within these structures.

It is recommended that indiscriminate dumping and exterior storage practices be controlled or cease and that exterior discarded materials be disposed of in a proper and appropriate manner. Should the indiscriminate dumping be the result of unauthorized site access, attention should be given to better secure or restrict the ability of unauthorized entry onto the property. If a material of unknown or potentially hazardous content is to be disposed, it is recommended that a full analytical waste characterization be performed so that an appropriate method of disposal is determined.

basement levels of the Boiler and Power House were partially underwater. It was determined that access to these levels proposed an unreasonable level of risk and potential for human harm. Accordingly, visual inspection of these levels were limited to available points of observation

It is most likely that the source of water in the basement is the Mahoning River which bounds the property to the East. Although beyond the scope of work for this project, it is speculated that the retaining wall or historic inlets for river water into the plant are being breached. Water levels did not appear to be stagnant.

Innerscope recommends that the standing water in the sub-levels be sampled for asbestos, PCB's, volatile organic compounds, pH, and metals. Based upon the results of analytical testing, a course of action may be developed to address the standing water in the basement as well as safe access for further physical inspection.

xii) During Innerscope's Site investigation, it was determined that the subject property has been used for industrial purposes since approximately the late 1890's. Facilities and support

operations involved in the production of electrical power have operated and flourished at the Site since the early 1900's until approximately 1970. Additionally, electric lamps and bulbs were manufactured and stored at the Site for approximately fifteen years. It is not uncommon for industrial or manufacturing facilities to produce waste by-products that have potentially hazardous or toxic constituents.

It is reasonable to ascertain that the long term industrial operations conducted at the Site may have negatively impacted upon the subject property. It is recommended that an extensive subsurface investigation be conducted such that soils are screened for metals, volatile organic and semi-volatile organic compounds.

6.0 QUALIFICATIONS

This study was designed to evaluate the potential for existing and future environmental liabilities being associated with the previous use or ownership of the property. INNERSCOPE is not responsible for nondisclosure of pertinent material by the client or his agents.

It should be noted that all superficial environmental assessments are inherently limited in the sense that conclusions are drawn and recommendations developed from information obtained from limited research and site evaluation. Subsurface conditions were not field investigated as part of this study and may differ from the conditions implied by the superficial observations. Additionally, the passage of time may result in a change in the environmental characteristics at this site and the surrounding properties.

Our professional services have been performed, our findings obtained and our recommendations prepared in accordance with customary principles and practices in the fields of environmental science and engineering. This warranty is in lieu of all other warranties either expressed or implied. INNERSCOPE is not responsible for the independent

conclusions, opinions or recommendations made by others based on the field exploration and laboratory test data presented in this report.

Assessment Field Report





ENVIRONMENTAL ASSESSMENT REPORT

INSPECTION DATA				
Property Address <u>U50</u>	Summit "	Street NW		
Cay Worsen	County	Trumball State	∪H	Zp_44485
Legal Description Sec				
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Environmental Inspector M				
) 755-44 8 3	D Fax (216) 759-4485
PROFERTY DESCRIPTI				
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GENERAL FIELD OBSER	RVATION			
Were there any physical signs following observed on the pro	_	A.L.		
	- 160 _	_ '**		
Underground	Sanrage Tanks	Streams, Lake	n or Ponds	Suspected Lead Hazard
Stained Soil	and age in a constant	Discarded Ba	_	X Suspected Asbestos (ACM)
X_ Vegetation Da	Mare .	X Oil/Cas Drum	_	Other
X Oily Sheem o		Above Croun	_	
	enetic Field Patentia			
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Waste SitesYes No Is the subject of	or any evidence of (neighboring property engag	ed in storing tran	isporting or producing waste,
chemicals or I	Nazardous substance	5 /		
Comments				
				
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STORAGETANKS				
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Yes No Unknown		e of Below Ground Storage		
Yes <u>*</u> No Unknown	Wat any evidence	e of soil or groundwater co	ntamination obser	wed on the property!
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Above Ground Storage Tanks (
Yes \(\frac{1}{2} \text{ MeUnknown}	Was any evidence	e of Above Ground Storage	r Tanks observed	on the property
WATER INSPECTION				
Drusting Water				
Yes 🗷 No Unknown	Was any evidence	e of water wells in use or a	ibandoned, observ	ved on the property!
Yes No Unknown		e primary or sole source of		* * -
			-	ding water visible on property?
Comments	·			
DCapyright 1984 Environmental Assoc	AMERICANA PARTS			P

Asbestos	-		
	Was evidence of asbestos observed on the property?		
X Yes _ No Unknown	Were any suspected asbestos containing materials observed such as sprayed materials on fireproofing areas, pipe insulation, floor tile, etc?		
Urea Formaldehyde Foam Inst			
Tes & No Unknown	 Was any evidence of Urea Formaldehyde Foam Insulation or other formaldehyde containing products observed on the property? 		
Lead Hazard			
	Was any visible evidence of peeling, cracking or flaking paint observed?		
Yes 👱 No Unknown	Was any evidence of lead containing potable water supply pipes observed on the property?		
Pesticides/Herbicides			
	Does it appear pesticides or herbicides have been used in excess of normal household use?		
Yes _č No Unknown	Are there any noticeable pesticide odors?		
Polychlorinated Biphenyl (PCB	P'a)		
Yes 👱 No Unknown	Were any transformers, electrical devices or hydraulic equipment observed on the property labelle as containing PCB's?		
Yes 🗶 No Unknown	Was evidence of PCB contamination to the soil or groundwater observed on the property?		
Radon	_		
Yes X No Unknown	Is there reason to suspect that Radon may be a problem in the dwelling or the immediate property's locality?		
Yes 🚣 No Unknown	Has Radon screening been conducted which indicates the property may have elevated levels of Radon?		
Comments			
·····			
	·		
GENERAL			
Yes No Are there an	ry conditions present not men Yes No Activities of adjacent properties may		
Yes No Are there an tioned above	e that need to be corrected to pose potential environmental risks to the		
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YesNo Are there an tioned above remove any CommentsSUMMARY & CONCLUS	e that need to be corrected to pose potential environmental risks to the potential risks? SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Use formaldehyde Foam Insulation (UFFI)		
YesNo Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Urea formaldehyde Foam Insulation (UFFI) ——Yes ——XNO Lead Hazard		
YesNo Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Urea formaldehyde Foam Insulation (UFFI) ——Yes ——XNO Lead Hazard ——X Yes		
Yes No Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Urea formaldehyde foam Insulation (UFFI) ——————————————————————————————————		
YesNo Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Urea formaldehyde Foam Insulation (UFFI) ——Yes ——XNO Lead Hazard ——X Yes		
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YesNo Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Urea formaldehyde Foam Insulation (UFFI) ——Yes ——XNo Lead Hazard ——X Yes ——No Pesticides/Herbicides ——Yes ——XNo Polychlorinated Biphenyl (PCB's) ——X Yes		
YesNo Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED JST's) Urea formaldehyde foam Insulation (Uffi) ——————————————————————————————————		
YesNo Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED JST's) Urea formaldehyde foam Insulation (Uffi) ——————————————————————————————————		
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YesNo Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Urea formaldehyde Foam Insulation (UFFI) Yes No Lead Hazard Yes No Pesticides/Herbicides Yes No Polychlorinated Biphenyl (PCB's) Yes No Radon Yes No ON IS SUGGESTED, SEE ATTACHED SUMMARY & CONCLUSION ADDENDUM. Indige and belief, the facts and data used in this inspection are true and accurate, based on the available information coordance with ASTM Guidelines E 1527-93, Phase I Environmental Site Assessment Process and E 1528-93.		
Lyes No Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Urea formaldehyde Foam Insulation (UFFI) — Yes — X No (AST's) Lead Hazard — Yes — No Pesticides/Herbicides — Yes — No Polychlorinated Biphenyl (PCB's) — X Yes — No Radon — Yes — No ON IS SUGGESTED, SEE ATTACHED SUMMARY & CONCLUSION ADDENDUM. Indige and belief, the facts and data used in this inspection are true and accurate, based on the available information coordance with ASTM Guidelines E 1527-93, Phase I Environmental Site Assessment Process and E 1528-93 anally inspected the subject property; and I have no undisclosed interest, present or prospective therein.		
Lyes No Are there an tioned above remove any Comments	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED Urea formaldehyde Foam Insulation (UFFI) Yes No Lead Hazard Yes No Pesticides/Herbicides Yes No Polychlorinated Biphenyl (PCB's) Yes No Radon Yes No ON IS SUGGESTED, SEE ATTACHED SUMMARY & CONCLUSION ADDENDUM. Indige and belief, the facts and data used in this inspection are true and accurate, based on the available information coordance with ASTM Guidelines E 1527-93, Phase I Environmental Site Assessment Process and E 1528-93.		
Lined above remove any Comments SUMMARY & CONCLUS SUMMARY & CONCLUS SUMMARY & CONCLUS Lined From Storage Tanks (U.X. Yes	pose potential environmental risks to the subject property. SION OF INSPECTION FURTHER INVESTIGATION RECOMMENDED JST's) Urea formaldehyde foam Insulation (UFFI) — Yes — Xno Lead Hazard — Yes — No Pesticides/Herbicides — Yes — No Polychlorinated Biphenyl (PCB's) — Yes — No Radon — Yes — No ON IS SUGGESTED, SEE ATTACHED SUMMARY & CONCLUSION ADDENDUM. Indige and belief, the facts and data used in this inspection are true and accurate, based on the available information coordance with ASTM Guidelines E 1527-93, Phase I Environmental Site Assessment Process and E 1528-93 mally inspected the subject property; and I have no undisclosed interest, present or prospective therein. Jalure		

CHEMICAL, GAS & MINERAL INSPECTION

Appendix B

Correspondence



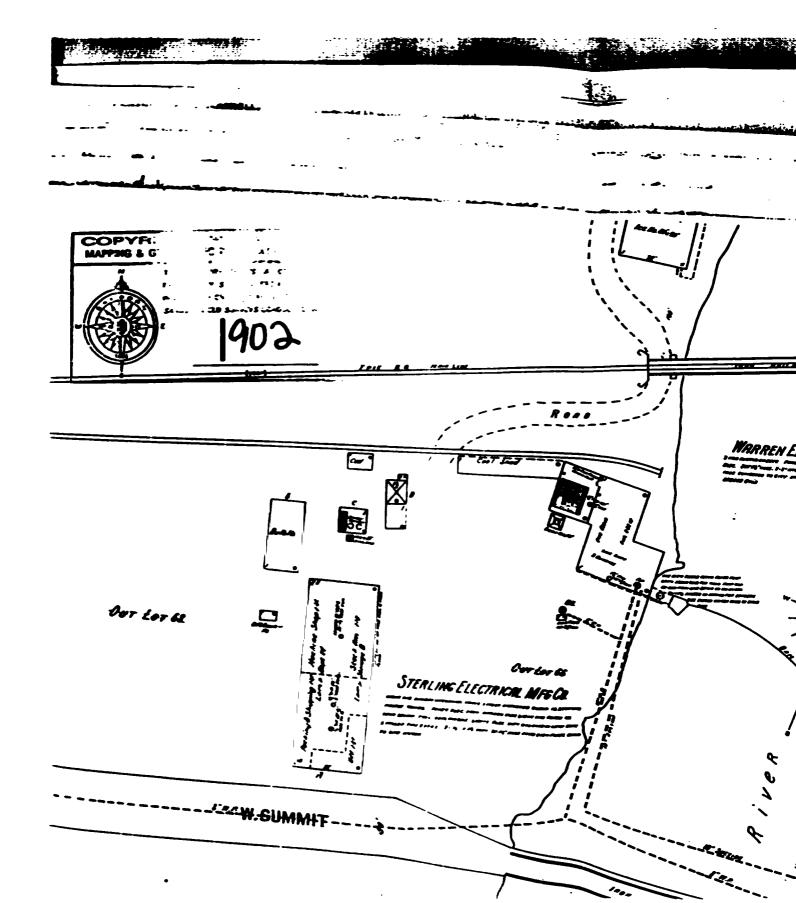


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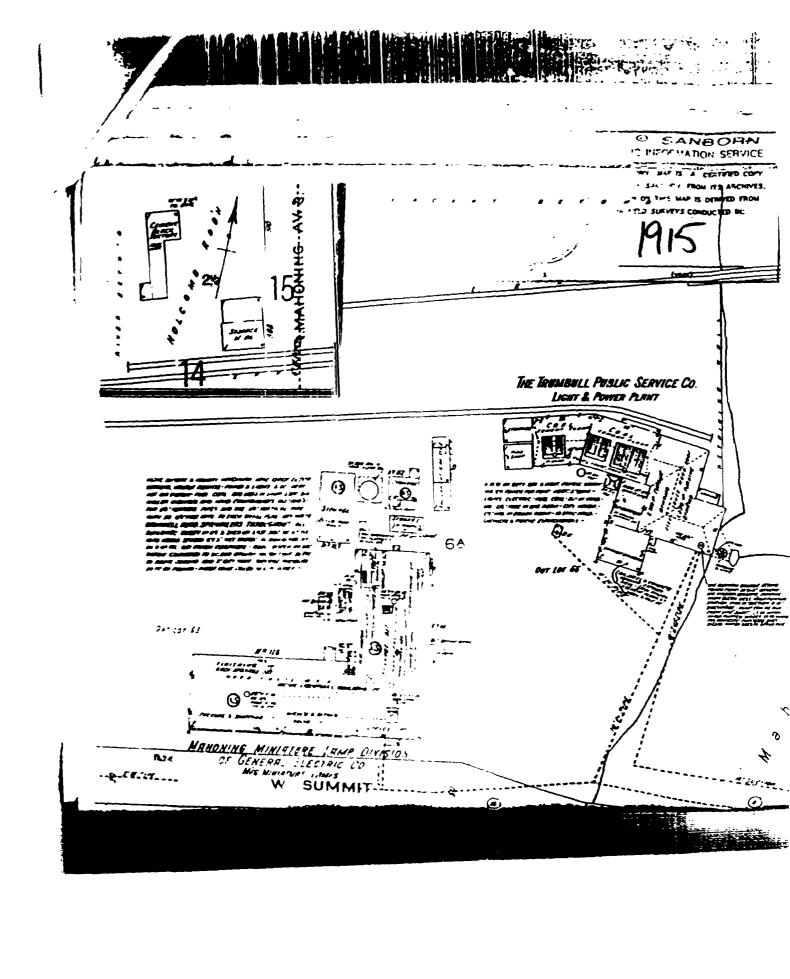
4531 Belmont Avenue, Suite # 7 Youngstown, Ohio 44505 216-759-4480 Fax 216-759-4485

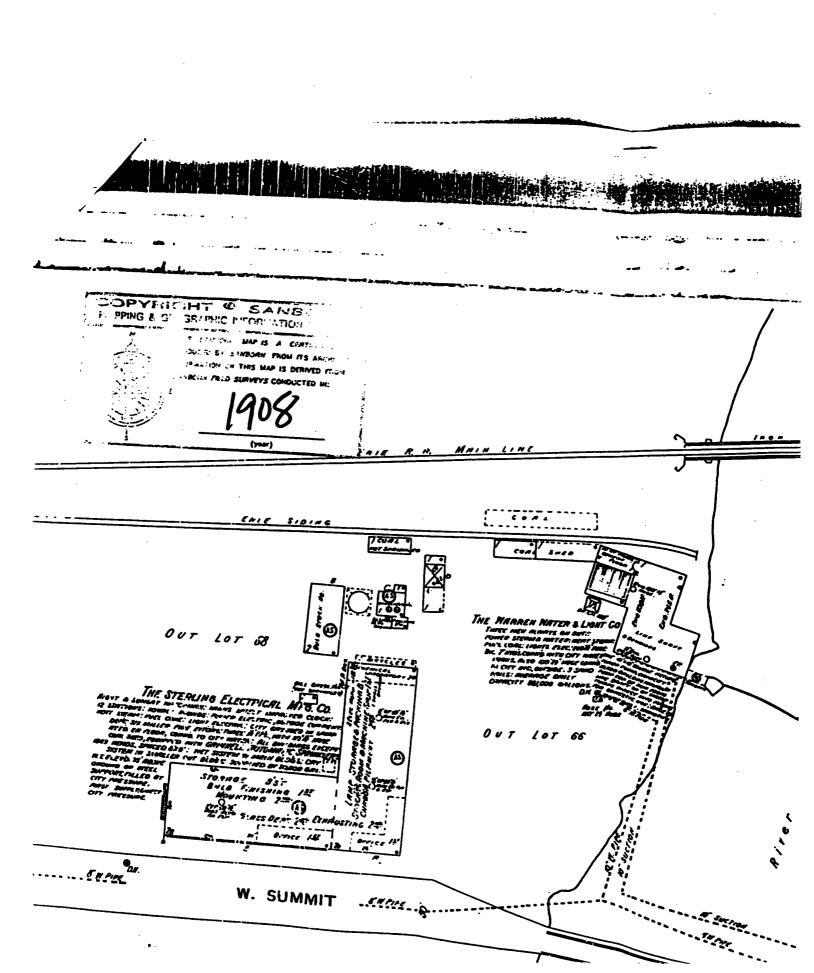
Date: 7-31-95 Job Number: 95221
To: DANTE NASSACCT, Je. Company: Gouth Main SAND & GRAVEL Fax Number: 392-6767
From: LEO HICKS
Subject: Copies of SANBORN MAR.
This facsimile transmission contains page(s) including this cover. If you do not receive all pages or if there is a problem with this fax, please contact this office immediately.
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AS Per YOUR CONVEYSATION WITH MATT MESIFICOS
ATTACHED ARE THE COPIES OF SAMBORN MAPS:
HY ADDITIONAL QUESTIONS OF REQUESTS PLASE, FEEL
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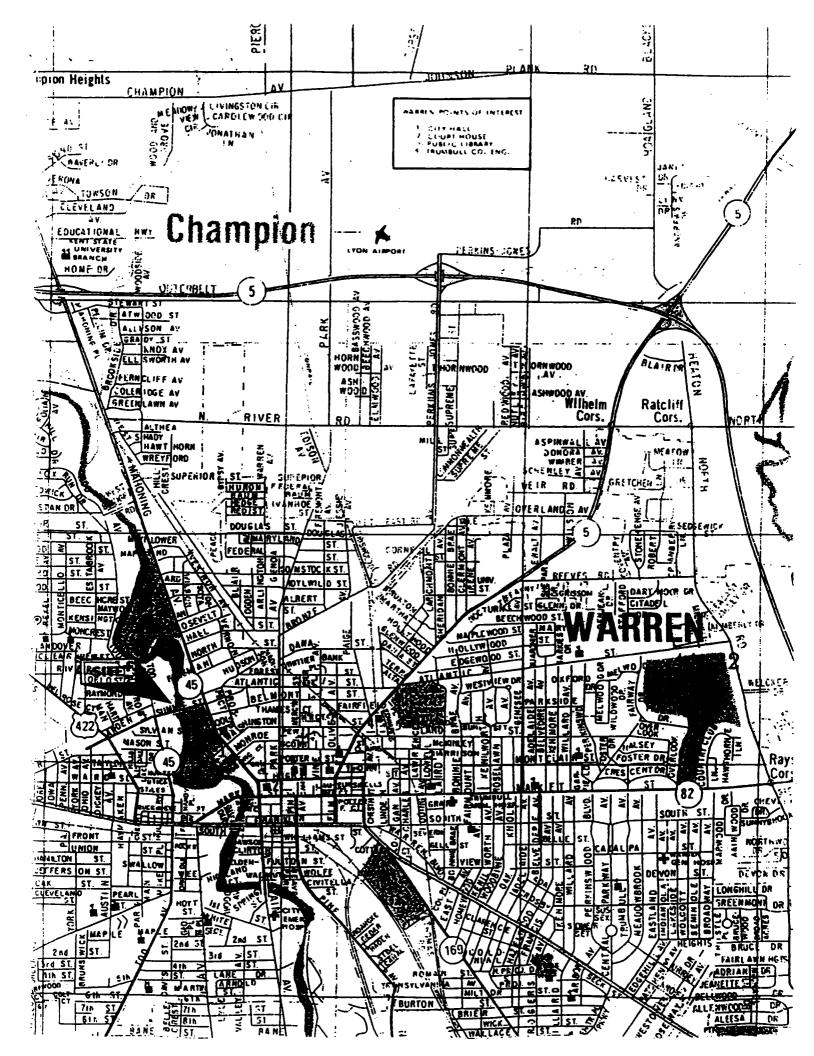


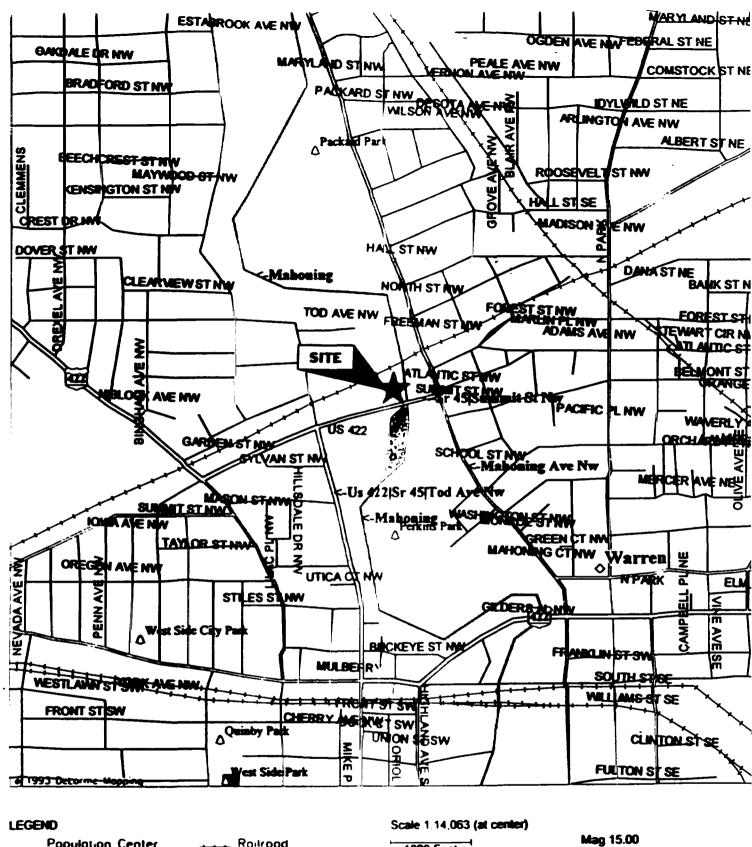
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4531 Belmont Avenue, Suite # 7 Youngstown, Ohio 44505 216-769-4480 Fax 216-759-4485

Date:	7-31-95	Job Number:	95221
To: Company:	Termbure 565	Fax Number:	216 38-6291
From:	Leo Hicks	_	
Subject:	COPIES OF ACTIAL	PHOTOGRAPHS	
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Message:			
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THANK 40	U FOR YOUR TIME 4 CONSI	DE CATTON!	
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LEGE	ND		Scale 1.14,063 (at center)		
	Population Center	Roilroad	1000 Feet	Mag 15.00	
•	Large City	River		Mon Jul 17 10:52:11 1995	
٥	Pork	Dpen Water	500 Meters		
7	US Highway			0 .0.4	
\leq	US Highway Street, Road		Mahoningside Power Plant 1050 Summit St., N.W		
	Maior Street /Pood		650 Summit St., N.W		

State Route

Major Street/Road

— US Highway